

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	Case No. 1:15-CR-048
)	
vs.)	
)	
BEAU CROGHAN,)	DEFENDANT’S MOTION TO
)	CONTINUE TRIAL AND TO
)	EXTEND PRETRIAL MOTIONS
)	DEADLINES
Defendant.)	

COMES NOW, Defendant, Beau Croghan, through counsel, and moves for a continuance of the trial date and an extension of the pretrial motions deadline. In support of said motion, counsel states:

1. The defendant is charged with Access or Attempt to Access Child Pornography, a violation of Title 18 U.S.C. §§ 2252A(a)(5)(B).
2. Trial is currently scheduled for February 8, 2016.
3. Additional time is needed as the defense is conducting a computer forensic examination of the evidence to prepare for trial or determine plea options.

Counsel is requesting that the trial in this matter be continued for an additional 60 days from the trial date presently set.
4. Counsel for the defendant is also requesting that the pretrial motions deadline be extended.
5. Counsel has conferred with Richard Rothrock, the AUSA prosecuting this case, and he does not oppose this motion.
6. Because the ends of justice served by granting this continuance outweigh the best

interest of the public and the defendant in a speedy trial, the period would be excludable for speedy trial purposes.

WHEREFORE, counsel for the defendant respectfully requests a continuance for an additional 60 days from the February 8, 2016 trial date and for an extension of the pretrial motions deadline.

/s/ Michael L. Smart
MICHAEL L. SMART
ATTORNEY FOR DEFENDANT

FEDERAL DEFENDER'S OFFICE
701 Pierce Street, Suite 400
Sioux City, Iowa 51101
712-352-0552
Alt phone: 712-252-4158
Email: Mike_Smart@fd.org
Alt email: Annette_Torgerson@fd.org

CERTIFICATE OF SERVICE

I hereby certify that on January 21, 2016, I electronically filed this document with the Clerk of Court using the ECF system which will serve it on the appropriate parties.

/s/ Annette Torgerson

cc via ECF: AUSA